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**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

In re)	
)	Chapter 11
RESIDENTIAL CAPITAL, LLC, <u>et al.</u> , ¹)	
)	Case No. 12-12020 (MG)
Debtors.)	
)	Jointly Administered

**NOTICE OF STIPULATION ADOPTING UNIFORM PROTECTIVE ORDER
FOR EXAMINER DISCOVERY FOR PURPOSES OF DISCOVERY
BY ALLY FINANCIAL INC. TO THE CREDITORS' COMMITTEE**

PLEASE TAKE NOTICE that non-debtor Ally Financial and its non-debtor affiliates (“Ally”) and the Official Committee of Unsecured Creditors (the “Committee”), hereby file the *Stipulation Adopting Uniform Protective Order for Examiner Discovery for Purposes of*

¹ The Debtors are: Ditech, LLC; DOA Holding Properties, LLC; DOA Holdings NoteCo, LLC; DOA Properties IX (Lots-Other), LLC; EPRE LLC; Equity Investment I, LLC; ETS of Virginia, Inc.; ETS of Washington, Inc.; Executive Trustee Services, LLC; GMAC Model Home Finance I, LLC; GMAC Mortgage USA Corporation; GMAC Mortgage, LLC; GMAC Residential Holding Company, LLC; GMACM Borrower LLC; GMACR Mortgage Products, LLC; GMAC-RFC Holding Company, LLC; GMACRH Settlement Services, LLC; HFN REO SUB II, LLC; Home Connects Lending Services, LLC; Homecomings Financial, LLC; Homecomings Financial Real Estate Holdings, LLC; Ladue Associates, Inc.; Passive Asset Transactions, LLC; PATI A, LLC; PATI B, LLC; PATI Real Estate Holdings, LLC; RAHI A, LLC; RAHI B, LLC; RAHI Real Estate Holdings, LLC; RCSFJV2004, LLC; Residential Accredit Loans, Inc.; Residential Asset Mortgage Products, Inc.; Residential Asset Securities Corporation; Residential Capital, LLC; Residential Consumer Services of Alabama, LLC; Residential Consumer Services of Ohio, LLC; Residential Consumer Services of Texas, LLC; Residential Consumer Services, LLC; Residential Funding Company, LLC; Residential Funding Mortgage Exchange, LLC; Residential Funding Mortgage Securities I, Inc.; Residential Funding Mortgage Securities II, Inc.; Residential Funding Real Estate Holdings, LLC; Residential Mortgage Real Estate Holdings, LLC; RFC Asset Holdings II, LLC; RFC Asset Management, LLC; RFC Borrower LLC; RFC Construction Funding, LLC; RFC SFJV-2002, LLC; and RFC-GSAP Servicer Advance, LLC.

Discovery by Ally Financial Inc. to the Creditors' Committee, attached hereto as Exhibit A, in connection with the *Order (I) Granting Examiner Authority to Issue Subpoenas for the Production of Documents and Authorizing the Examination of Persons and Entities, (II) Establishing Procedures for Responding to Those Subpoenas (III) Approving Establishment of a Document Depository and Procedures to Govern Use, and (IV) Approving Protective Order*, dated August 20, 2012 [Docket No. 1223].

Dated: September 7, 2012
New York, New York

Respectfully Submitted,

/s/ Patrick M. Bryan
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EXHIBIT A

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

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	:	
In re:	:	Chapter 11
	:	
RESIDENTIAL CAPITAL, LLC, <u>et al.</u> ,	:	Case No. 12-12020 (MG)
	:	
Debtors.	:	Jointly Administered
	:	
-----	X	

**STIPULATION ADOPTING UNIFORM PROTECTIVE ORDER
FOR EXAMINER DISCOVERY FOR PURPOSES OF DISCOVERY
BY ALLY FINANCIAL INC. TO THE CREDITORS' COMMITTEE**

Non-Debtor Ally Financial Inc. and its non-debtor affiliates ("Ally") and the Official Committee of Unsecured Creditors (the "Committee") hereby stipulate to and adopt by reference the terms and conditions of the Order [Doc. 1223] and Uniform Protective Order for Examiner Discovery [Doc. 1223-1] such that these terms and conditions shall govern the disclosure, discovery, production, and use of documents and other information provided by Ally to the Committee in the above-referenced chapter 11 cases.

Dated: New York, New York
September 7, 2012

KRAMER LEVIN NAFTALIS & FRANKEL LLP

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Counsel to Non-Debtors Ally Financial Inc. and Ally Bank

Dated: September __, 2012

SO ORDERED:

Honorable Martin Glenn
United States Bankruptcy Judge